

HOLLAND & KNIGHT LLP
David A. Robinson, Esq. (SBN 107613)
david.robinson@hklaw.com
John F. Wood, Esq. (Pro Hac Vice)
john.f.wood@hklaw.com
Stephen P. Warren (Pro Hac Vice)
stephen.warren@hklaw.com
Brendan H. Connors (Pro Hac Vice)
brendan.connors@hklaw.com
4675 MacArthur Court, Suite 900
Newport Beach, CA 92660
Telephone: 949.833.8550
Facsimile: 949.833.8540

Attorneys for Defendants
Daniel Carter, Kieran Duggan and
S. Westley Shedd

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

MATTHEW D. VAN STEENWYK, et
al.,

Plaintiffs,

vs.

KEDRIN E. VAN STEENWYK, et al.,
Defendants.

Case No. 2:24-cv-07401-FLA-AJR

**DEFENDANTS DANIEL CARTER,
KIERAN DUGGAN AND S.
WESTLEY SHEDD'S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

Defendants Daniel Carter, Kieran Duggan and S. Westley Shedd hereby request this Court take judicial notice of the pleadings in the case initiated by Plaintiff Matthew Van Steenwyk in the Superior Court of California, County of San Luis Obispo, *Steenwyk, et al. v. Steenwyk, et al.*, Case No. 23-CVP-0146 (“Superior Court Action”):

Exhibit 1: Complaint filed in the Superior Court Action.

Exhibit 2: First Amended Complaint filed in the Superior Court Action.

Exhibit 3: Motion Pursuant to Corporations Code Section 800(c) in the Superior Court Action (“Bond Motion”).

Exhibit 4: Court Ruling on Bond Motion in the Superior Court Action.

Exhibit 5: Motion for Reconsideration of Imposition of Bond in the Superior Court Action.

Exhibit 6: Motion for Leave to File Second Amended Complaint in the Superior Court Action.

Exhibit 7: Second Amended Complaint in the Superior Court Action.

Exhibit 8: Request for Dismissal in the Superior Court Action.

The court has the power to and should take judicial notice of Plaintiff Matthew Van Steenwyk’s Superior Court Action. *Burbank-Glendale-Pasadena Airport Auth. v. City of Burbank*, 136 F.3d 1360, 1364 (9th Cir. 1998) (granting request to take judicial notice of pleadings filed in a related state court action).

Respectfully submitted,

Dated: December 13, 2024

HOLLAND & KNIGHT LLP

/s/ Brendan H. Connors

David A. Robinson

John F. Wood

Stephen P. Warren

Brendan H. Connors

Attorney for Defendants Daniel Carter, Kieran Duggan and Inc., S. Westley Shedd

CERTIFICATE OF SERVICE

The undersigned certifies that the Defendants Daniel Carter, Kieran Duggan and S. Westley Shedd's Request for Judicial Notice in Support of Motion to Dismiss First Amended Complaint was filed electronically with the Clerk of the Court via the CM/ECF system, which effectuates service to all parties registered and designated for the CM/ECF system in this action. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by court rules.

I declare under penalty of perjury under the laws of the United States of America and the laws of the State of California that the foregoing is true and correct.

Executed on December 13, 2024

By: /s/ Brendan H. Connors